

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

---

VIRGINIA WOLF, *et al.*,

Plaintiffs,

v.

Case No. 14-C-00064-BBC

SCOTT WALKER, *et al.*,

Defendants.

---

**PLAINTIFFS' MOTION FOR CLARIFICATION OF THE INJUNCTION ORDER**

---

Pursuant to Rule 7, Fed. R. Civ. P., Plaintiffs Kami Young and Karina Willes (collectively, "Plaintiffs") respectfully move this Court for clarification of its injunction order, ECF No. 134, in light of *Baskin v. Bogan*, 766 F.3d 648, 672 (7th Cir.) *cert. denied*, 135 S. Ct. 316 (2014) and *cert. denied sub nom. Walker v. Wolf*, 135 S. Ct. 316 (2014). Specifically, Plaintiffs ask that the Court clarify its injunction to:

- a) direct the State Registrar in the Department of Health Services ("Registrar") to equally apply Wisconsin's presumption of parenthood for married couples, codified at Wis. Stat. § 891.41(1)(a), to both different-sex and same-sex couples;
- b) direct the Registrar to include both same-sex parents on the birth certificates of their children born during the marriage pursuant to Wis. Stat. § 69.14(1)(e)1, just as it does for different sex couples; and
- c) order the Registrar to issue a new original birth certificate nunc pro tunc for Plaintiffs' daughter born during the marriage to secure their parental rights and duties.

In support of this Motion, Plaintiffs concurrently submit a Memorandum in Support of the Motion and Declarations and Exhibits thereto, which are hereby incorporated in this Motion by reference.

Dated: April 20, 2015

By: /s/ Laurence J. Dupuis  
Counsel for Plaintiffs

JOHN A. KNIGHT  
American Civil Liberties Union Foundation  
Lesbian Gay Bisexual Transgender Project  
180 North Michigan Avenue  
Suite 2300  
Chicago, Illinois 60601  
(312) 201-9740  
jaknight@aclu.org

JAMES D. ESSEKS  
American Civil Liberties Union Foundation  
Lesbian Gay Bisexual Transgender Project  
125 Broad Street  
New York, New York 10004  
(212) 549-2623  
jesseks@aclu.org

LAURENCE J. DUPUIS  
SBN: 1029261  
American Civil Liberties Union of  
Wisconsin Foundation  
207 E. Buffalo Street, Suite 325  
Milwaukee, Wisconsin 53202  
(414) 272-4032  
ldupuis@aclu-wi.org

HANS J. GERMANN  
FRANK DICKERSON  
LINDA X. SHI\*  
KATHLEEN M. PRZYWARA\*  
Mayer Brown LLP  
71 South Wacker Drive  
Chicago, Illinois 60606-4637  
(312) 782-0600  
hgermann@mayerbrown.com  
fdickerson@mayerbrown.com  
lshi@mayerbrown.com  
kprzywara@mayerbrown.com

\*applications for admission pro  
hac vice pending.